

FRANKLIN BROCKWAY GOWDY,
SBN 47918
THOMAS D. KOHLER, SBN 207917
MORGAN, LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco, CA 94105-1126
Tel: 415.442.1000
Fax: 415.442.1001

DAVID C. BOHRER, SBN 212397
MICHAEL J. LYONS, SBN 202284
MORGAN, LEWIS & BOCKIUS LLP
2 Palo Alto Square
3000 El Camino Real, Suite 700
Palo Alto, CA 94306-2212
Tel: 650.843.4000
Fax: 650.843.4001

Attorneys for Plaintiff and Counter-
defendant
NIDEC CORPORATION

MARTIN R. GLICK, SBN 40187
BOBBIE J. WILSON, SBN 148317
HOWARD RICE NEMEROVSKI CANADY
FALK & RABKIN
A Professional Corporation
Three Embarcadero Center, 7th Floor
San Francisco, CA 94111-4024
Tel: 415.434.1600
Fax: 415.217.5910

MORTON AMSTER (pro hac vice)
ANTHONY F. LO CICERO (pro hac vice)
CHARLES R. MACEDO (pro hac vice)
AMSTER, ROTHSTEIN & EBENSTEIN LLP
90 Park Avenue
New York, NY 10016
Tel: 212.336.8000
Fax: 212.336.8001

Attorneys for Defendants
JVC COMPONENTS (THAILAND) CO., LTD.,
AGILIS, Inc., and AGILIS TECHNOLOGY
INC. and Defendant and Counter-plaintiff
VICTOR COMPANY OF JAPAN, LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

NIDEC CORPORATION,

Plaintiff,

vs.

VICTOR COMPANY OF JAPAN, LTD.,
JVC COMPONENTS (THAILAND) CO.,
LTD., AGILIS, Inc., and AGILIS
TECHNOLOGY INC.,

Defendants.

Case No. C05 00686 SBA (N.D. Cal.)

Action Filed: February 15, 2005

**L.R. 7-12 JOINT STIPULATION AND
[PROPOSED] ORDER LIMITING LEGAL
EXPERT TESTIMONY**

Judge: Honorable Edward M. Chen

Trial Date: September 24, 2007

1 The parties to the above action have met and conferred and as a result hereby enter into
2 the following joint stipulation:

3 To the extent legal expert or patent practice expert testimony from Mr. Lawrence J.
4 Goffney, Jr. or Prof. Martin Adelman, or from any other legal or patent practice expert, is
5 permitted by the Court that testimony will be limited to the issue of the prosecution of the '973
6 Patent. Neither side will seek to offer legal or patent practice expert testimony on any other
7 issue, and, in particular, there will be no such expert testimony related to willfulness issues by
8 either party.

9 This stipulation is entered into solely for the purpose of narrowing the issues for expert
10 discovery and deposition and shall not be deemed to be an admission of, nor used by either party
11 in support of any arguments for or against, the following positions as have been previously set
12 forth by the parties:

13 1) Nidec's position that legal expert or patent practice expert testimony is not necessary,
14 applicable or permissible on any issue in this action;

15 2) JVC's position that Nidec should not be permitted to offer any testimony from Prof.
16 Adelman due to the alleged failure to provide an adequate expert report;

17 3) Nidec's position that it is entitled to present rebuttal testimony from Prof. Adelman to
18 the extent that the Court permits testimony from Mr. Goffney on the '973 Patent prosecution.

19 The parties have agreed that these questions will be resolved at a later date in the course of
20 the pretrial procedures.

21 This stipulation does not preclude use of the testimony given by the patent prosecution
22 attorneys nor does it preclude the technical experts in the case from testifying about the
23 prosecution histories of any or all of the patents in suit.

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1 In addition, the parties agree that to the extent the deposition of either legal expert occurs
2 by agreement after July 20, 2007, neither party will use the fact of such deposition occurring after
3 that date as a basis for arguing for an extension of any other date or a delay in the trial date.

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5 Respectfully submitted,

6 Dated: July 16, 2007

MORGAN, LEWIS & BOCKIUS LLP

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9 By: /S/

10 Thomas D. Kohler
Attorneys for Plaintiff and Counter-defendant
NIDEC CORPORATION

11 HOWARD, RICE, NEMEROVSKI,
12 CANADY, FALK & RABKIN

13 AMSTER, ROTHSTEIN & EBENSTEIN LLP

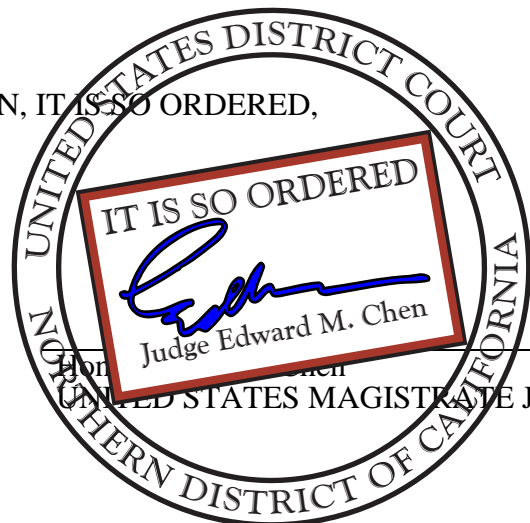
14 By: /S/

15 Charles R. Macedo
Attorneys for Defendants
16 JVC COMPONENTS (THAILAND) CO.,
LTD., AGILIS INC., and AGILIS
17 TECHNOLOGY INC., and Defendant and
Counter-plaintiff VICTOR COMPANY OF
18 JAPAN, LTD.

19
20 PURSUANT TO STIPULATION, IT IS SO ORDERED,

21
22
23 7/27/07

24 Dated: _____



25 _____
UNITED STATES MAGISTRATE JUDGE

26 W03 161590001/1403992/v1
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